

EXHIBIT C

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x
TUFAMERICA, INC., :
Plaintiff, : Index No.:
v. : 12-CIV-3529 (AJN)
MICHAEL DIAMOND, et al., :
Defendants. :

- - - - -x

Videotaped Deposition of TONY W. FISHER
Washington, DC
Thursday, May 1, 2014
9:03 a.m.

Reported By: Lee Bursten, RMR, CRR

<p style="text-align: right;">Page 2</p> <p>1 Videotaped Deposition of TONY W. FISHER, 2 held at the offices of: 3 4 5 JENNER & BLOCK LLP 6 1099 New York Avenue NW 7 Suite 900 8 Washington, DC 20001 9 (202) 639-6000 10 11 12 13 14 Pursuant to Notice, before Lee Bursten, 15 Registered Merit Reporter, Certified Realtime 16 Reporter, and Notary Public in and for the District 17 of Columbia, who officiated in administering the oath 18 to the witness. 19 20 21 22</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES CONTINUED 2 ON BEHALF OF DEFENDANTS MICHAEL DIAMOND, ADAM 3 HOROVITZ, AND THE ESTATE OF ADAM YAUCH, PERFORMERS 4 KNOWN AS THE BEASTIE BOYS: 5 THEODORE C. MAX, ESQUIRE 6 SHEPPARD MULLIN RICHTER & HAMPTON LLP 7 30 Rockefeller Plaza 8 New York, New York 10112 9 (212) 653-8700 10 11 ALSO PRESENT: 12 MICHAEL E. CILIBERTI, Videographer 13 14 15 16 17 18 19 20 21 22</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES 2 ON BEHALF OF PLAINTIFF AND THE WITNESS: 3 KELLY D. TALCOTT, ESQUIRE 4 THE LAW OFFICES OF KELLY D. TALCOTT 5 34 Grove Street 6 P.O. Box 43 7 Sea Cliff, New York 11579 8 (516) 515-1545 9 10 ON BEHALF OF DEFENDANTS UMG - POLYGRAM INTERNATIONAL 11 PUBLISHING INC. and CAPITOL RECORDS LLC: 12 ANDREW H. BART, ESQUIRE 13 JENNER & BLOCK LLP 14 919 Third Avenue 15 37th Floor 16 New York, New York 10022 17 (212) 891-1600 18 19 20 21 22</p>	<p style="text-align: right;">Page 5</p> <p>1 CONTENTS 2 EXAMINATION OF TONY W. FISHER PAGE 3 By Mr. Bart 7 4 By Mr. Max 231 5 6 7 EXHIBITS 8 (Attached to transcript) 9 DEFENDANTS' DEPOSITION EXHIBITS PAGE 10 Exhibit 18 Master Administration Agreement 211 11 between TufAmerica and Robert 12 Reed and Tony Fisher dba Trouble 13 Funk 14 Exhibit 19 Publishing Administration 211 15 Agreement between TufAmerica and 16 Robert Reed and Tony Fisher dba 17 Trouble Funk 18 Exhibit 20 Printout from Trouble Funk 263 19 website 20 21 22</p>

<p style="text-align: right;">Page 118</p> <p>1 A Myself, James Avery, Robert Reed, and</p> <p>2 Taylor Reed.</p> <p>3 Q Okay. So the four of you were there, and</p> <p>4 Maxx Kidd was there, and Chris Blackwell was there.</p> <p>5 Was anybody else there?</p> <p>6 A Yeah, there were some other people there.</p> <p>7 I don't remember.</p> <p>8 Q Do you remember where in Georgetown this</p> <p>9 took place?</p> <p>10 A It was in a hotel. I don't know exactly</p> <p>11 what hotel it was.</p> <p>12 Q And what do you recall about the</p> <p>13 discussions during that meeting?</p> <p>14 A Well, Chris Blackwell, I distinctly</p> <p>15 remember him saying that, you know, Maxx Kidd was not</p> <p>16 only a business, you know, acquaintance, but he was a</p> <p>17 personal friend, and he's the type of person you're</p> <p>18 going to love him or you're going to hate him. And</p> <p>19 he said, "Frankly, I love him, and, you know, if</p> <p>20 you're going to do business with me, you have to do</p> <p>21 business with Maxx Kidd."</p> <p>22 Q Okay.</p>	<p style="text-align: right;">Page 120</p> <p>1 of the other acts.</p> <p>2 Q Okay.</p> <p>3 A Outside of Trouble Funk.</p> <p>4 Q Okay. And so as a result of that meeting,</p> <p>5 there were a whole bunch of discussions and</p> <p>6 negotiations leading to agreements, correct?</p> <p>7 A Correct.</p> <p>8 Q Okay. And you guys retained Mr. Tisdale to</p> <p>9 represent your interests in that, correct?</p> <p>10 A I believe so, yes.</p> <p>11 Q Okay. And you signed a bunch of documents</p> <p>12 in the end of 1984 as a result of those negotiations,</p> <p>13 right?</p> <p>14 A I had signed some documents, yes.</p> <p>15 Q Okay.</p> <p>16 A With Island Records.</p> <p>17 Q With Island Records and with Maxx Kidd?</p> <p>18 A Not that I remember, no.</p> <p>19 Q Okay. When was the -- so there were</p> <p>20 documents, and I'll show them to you in a couple of</p> <p>21 minutes, and we can talk about this, there's no</p> <p>22 secret about what the documents are, and they're all</p>
<p style="text-align: right;">Page 119</p> <p>1 A I walked out. And they came back and got</p> <p>2 me. And, you know -- because I wasn't doing business</p> <p>3 with Maxx Kidd, you know.</p> <p>4 Q Well, you say you weren't doing business</p> <p>5 with Maxx Kidd, but you were personally doing</p> <p>6 business with Maxx Kidd as a producer in other ways,</p> <p>7 weren't you?</p> <p>8 A Yeah. Yeah. But he was paying me to do --</p> <p>9 you know what I'm saying.</p> <p>10 Q No, I understand.</p> <p>11 A I wasn't signing anything with him.</p> <p>12 Q Okay.</p> <p>13 A Yeah. He wanted me to do some stuff for</p> <p>14 his artists, pay me, let me get my money, and I do</p> <p>15 whatever you need done, and that was that. It wasn't</p> <p>16 personal. Business.</p> <p>17 Q So they came and got you, and you went back</p> <p>18 into the meeting. What else took place?</p> <p>19 A Well, we came to an agreement that Island</p> <p>20 Records would pay us...</p> <p>21 Q Directly.</p> <p>22 A Directly. And Maxx Kidd would handle all</p>	<p style="text-align: right;">Page 121</p> <p>1 dated October 11th, 1984.</p> <p>2 Have you seen any of those documents in the</p> <p>3 last 30 years, since the time they were signed?</p> <p>4 A No.</p> <p>5 Q Okay. Do you recall reading the documents</p> <p>6 that you signed before you signed them?</p> <p>7 A No, I don't recall reading the documents,</p> <p>8 but I recall the documents being read by the lawyer.</p> <p>9 Q By Mr. Tisdale?</p> <p>10 A By Mr. Tisdale.</p> <p>11 Q So you recall that Mr. Tisdale read them,</p> <p>12 he spoke to you guys and you guys signed the</p> <p>13 agreement?</p> <p>14 MR. TALCOTT: Objection.</p> <p>15 BY MR. BART:</p> <p>16 Q Is that correct?</p> <p>17 A No, it wasn't that simple. I remember some</p> <p>18 agreements that we had to go back and actually change</p> <p>19 some things.</p> <p>20 Q What do you recall --</p> <p>21 A And initial them.</p> <p>22 Q Okay.</p>

<p style="text-align: right;">Page 122</p> <p>1 A They were initialed and signed. The</p> <p>2 changes were made.</p> <p>3 Q Okay.</p> <p>4 A And a lot of that stuff was with Island and</p> <p>5 Maxx Kidd that you spoke of.</p> <p>6 Q Okay. You recall that there was a change</p> <p>7 made in the document before you signed it.</p> <p>8 A Right.</p> <p>9 Q Because there was a provision saying that</p> <p>10 Island wasn't going to pay you directly, and you</p> <p>11 crossed that out and you initialed it, and then you</p> <p>12 signed it with the change, correct?</p> <p>13 MR. TALCOTT: Objection.</p> <p>14 A Yes. There were also some changes that we</p> <p>15 had to make that Maxx had put in there as far as</p> <p>16 trying to control and wanted us to give him full</p> <p>17 control over our writers' rights and all that stuff.</p> <p>18 That was crossed out.</p> <p>19 BY MR. BART:</p> <p>20 Q All right.</p> <p>21 A And initialed.</p> <p>22 Q Why don't you take a look first at what we</p>	<p style="text-align: right;">Page 124</p> <p>1 some handwriting, correct?</p> <p>2 A Yes.</p> <p>3 Q And finally, if you look at pages 15 and</p> <p>4 17, you'll see that there is certain language that's</p> <p>5 bracketed there as well?</p> <p>6 A Mm-hmm.</p> <p>7 Q It's fair to say, isn't it, Mr. Fisher,</p> <p>8 that you don't know when the handwriting that is on</p> <p>9 this copy of the document was put on this document,</p> <p>10 correct?</p> <p>11 A Yes.</p> <p>12 Q Okay. And you don't know whose handwriting</p> <p>13 it is either, do you?</p> <p>14 A You mean...</p> <p>15 Q Where there's handwriting. I'm not talking</p> <p>16 about the brackets.</p> <p>17 A No. No, I don't.</p> <p>18 Q For example, on page 6, there's a bunch of</p> <p>19 handwriting to the right of the top half of the page,</p> <p>20 on the page that's marked 6.</p> <p>21 A I don't know. I have no idea.</p> <p>22 Q Okay. Fair enough. So other than being</p>
<p style="text-align: right;">Page 123</p> <p>1 marked yesterday as Exhibit 4.</p> <p>2 A Okay.</p> <p>3 Q First off, Mr. Fisher, without going</p> <p>4 through this in detail, take a look at the back page,</p> <p>5 page 18. That's your signature on the second line,</p> <p>6 isn't it?</p> <p>7 A Yep.</p> <p>8 Q Okay. Now, you haven't seen this document</p> <p>9 since it was signed in 1984, have you?</p> <p>10 A No.</p> <p>11 Q Okay. Take a look at the document itself,</p> <p>12 and you'll see on page 2, there's a circle.</p> <p>13 A Mm-hmm.</p> <p>14 Q And an X underneath it. And you'll see on</p> <p>15 page 5, page 5, that there is a bracket around</p> <p>16 paragraph 2.02, and it says "James A." next to it.</p> <p>17 A Mm-hmm.</p> <p>18 Q And there's a little squiggly line under</p> <p>19 the number 15,000 down near the bottom of the page on</p> <p>20 301; do you see that?</p> <p>21 A No. Okay.</p> <p>22 Q And you'll see that on page 6, there is</p>	<p style="text-align: right;">Page 125</p> <p>1 able to verify your signature on the document, you</p> <p>2 don't have any other present recollection of any of</p> <p>3 the terms or conditions of this agreement, do you?</p> <p>4 A No.</p> <p>5 Q Okay. And is it your testimony that prior</p> <p>6 to the time you signed this agreement, that you</p> <p>7 didn't read it, but your counsel explained it to you?</p> <p>8 Is that a fair statement?</p> <p>9 A Yes.</p> <p>10 Q Okay. Let me show you -- you can hold it</p> <p>11 if you want to. I'm not going to ask you anymore</p> <p>12 questions on that. I'll show you what's been marked</p> <p>13 as Exhibit -- well, let me show you 2 and 3, because</p> <p>14 they're related. Exhibit 3 is an agreement between</p> <p>15 Island Records and T.T.E.D. Records, as you put it,</p> <p>16 correct?</p> <p>17 A Okay.</p> <p>18 Q Okay. Actually, you should, just for --</p> <p>19 just bear with me one second. Keep this exhibit in</p> <p>20 front of you for a minute as well, the Exhibit 4.</p> <p>21 And let me just point you to the language. You have</p> <p>22 Exhibit 4 in front of you?</p>

<p style="text-align: right;">Page 126</p> <p>1 A Yes.</p> <p>2 Q Now, this exhibit, Exhibit 4, is labeled an</p> <p>3 exclusive recording agreement. And at the very, very</p> <p>4 bottom of page 1, the very last line, it starts off</p> <p>5 and says, "Island Records Inc. hereinafter Island,"</p> <p>6 and you go to the next page, "Company have entered</p> <p>7 into a record production contract of even date,</p> <p>8 hereinafter the Island contract."</p> <p>9 Do you see that language?</p> <p>10 A Yeah.</p> <p>11 Q And the date that's on this recording</p> <p>12 agreement is October 11th, 1984, on the very first</p> <p>13 page, on the first line. Do you see that? At the</p> <p>14 very top, right underneath "Exclusive Recording</p> <p>15 Agreement."</p> <p>16 A Yes. Mm-hmm.</p> <p>17 Q So there's a reference here to the fact</p> <p>18 that on the same date as this, Island Records, and</p> <p>19 the company, which is T.T.E.D. Records, are entering</p> <p>20 into a separate agreement.</p> <p>21 MR. TALCOTT: Objection.</p> <p>22 BY MR. BART:</p>	<p style="text-align: right;">Page 128</p> <p>1 recording agreement, right?</p> <p>2 A Mm-hmm.</p> <p>3 Q And it says the same date that we're</p> <p>4 executing this, Island Records and the company have</p> <p>5 entered into a separate record production agreement.</p> <p>6 Do you see that?</p> <p>7 A Yes.</p> <p>8 Q Okay. Then I showed you Exhibit 2. Do you</p> <p>9 have Exhibit 2?</p> <p>10 A Yes.</p> <p>11 Q Which at the very top says, "This letter</p> <p>12 when signed by you and us shall, along with the</p> <p>13 attached production contract standard conditions,</p> <p>14 constitute the agreement between you and us." It's</p> <p>15 dated October 11th, 1984. It's between Island</p> <p>16 Records and T.T.E.D. Records.</p> <p>17 And I'm asking you, do you have any</p> <p>18 knowledge that would suggest that these aren't the</p> <p>19 two contracts that are referring to each other?</p> <p>20 MR. TALCOTT: Objection.</p> <p>21 A No.</p> <p>22 BY MR. BART:</p>
<p style="text-align: right;">Page 127</p> <p>1 Q Do you see that language?</p> <p>2 A Yes.</p> <p>3 Q Okay. Now, take a look at Exhibit 2, which</p> <p>4 is in front of you.</p> <p>5 A Mm-hmm.</p> <p>6 Q Which is -- has the same date as the other</p> <p>7 agreement, correct? It's also dated October 11th,</p> <p>8 1984.</p> <p>9 A Okay.</p> <p>10 Q And it's between Island Records Inc. and</p> <p>11 T.T.E.D. Records Inc. Do you see that?</p> <p>12 A Yes.</p> <p>13 Q Okay. Do you have any knowledge or</p> <p>14 information that would suggest to you that this</p> <p>15 second agreement, Exhibit 4 -- Exhibit 2, I'm</p> <p>16 sorry -- is not the agreement referenced in Exhibit</p> <p>17 4?</p> <p>18 MR. TALCOTT: Objection.</p> <p>19 BY MR. BART:</p> <p>20 Q Do you understand my question?</p> <p>21 A No.</p> <p>22 Q Okay. I showed you Exhibit 4, which is the</p>	<p style="text-align: right;">Page 129</p> <p>1 Q You have no knowledge?</p> <p>2 A No.</p> <p>3 Q Fair enough. And again, just to make the</p> <p>4 record clear, do you have any recollection sitting</p> <p>5 here today that you have ever read the document that</p> <p>6 is marked as Plaintiff's Exhibit 2?</p> <p>7 A No.</p> <p>8 Q Defendants' Exhibit 2, I'm sorry. No?</p> <p>9 A No.</p> <p>10 Q But that that may well have been a document</p> <p>11 that was read by and reported to you by your counsel,</p> <p>12 correct?</p> <p>13 MR. TALCOTT: Objection.</p> <p>14 A Could have been. I don't know.</p> <p>15 BY MR. BART:</p> <p>16 Q Okay. Take a look at Exhibit 3, which says</p> <p>17 "Letter of Inducement."</p> <p>18 A Mm-hmm.</p> <p>19 Q First let's go to the back of it, it's page</p> <p>20 31. You see at the bottom, it says page 31?</p> <p>21 A Yes.</p> <p>22 Q Okay. And that's your signature on the</p>

<p style="text-align: right;">Page 130</p> <p>1 second line, right?</p> <p>2 A It's hard to say. It's so faded, it's hard</p> <p>3 to say. It looks like it could be my signature, yes.</p> <p>4 Q Okay. Take a look at page 18 of Exhibit 4,</p> <p>5 and hold it up next to page 31 of Exhibit 3. Do you</p> <p>6 have the two signatures? Those are both your</p> <p>7 signatures, aren't they, Mr. Fisher?</p> <p>8 MR. TALCOTT: Objection.</p> <p>9 A Yes. Exact.</p> <p>10 BY MR. BART:</p> <p>11 Q Thank you.</p> <p>12 A The exact same signature.</p> <p>13 Q Fair enough. Now, at the beginning of this</p> <p>14 Exhibit 3, you can put Exhibit 4 away for right now,</p> <p>15 this is a letter from the members of Trouble Funk,</p> <p>16 right? It's signed by the four members who were</p> <p>17 there, Taylor Reed, Robert Reed, Tony Fisher, and</p> <p>18 James Avery, right?</p> <p>19 A Mm-hmm.</p> <p>20 Q Yes?</p> <p>21 A Yes, sir.</p> <p>22 Q By the way, are you familiar with the</p>	<p style="text-align: right;">Page 132</p> <p>1 a letter that is being sent by the members of the</p> <p>2 band to Island Records dated as of October 11th,</p> <p>3 1984, and it says in the first paragraph, "Pursuant</p> <p>4 to an exclusive recording agreement, the artist</p> <p>5 agreement, between me and T.T.E.D. Records"; do you</p> <p>6 see that language?</p> <p>7 A No.</p> <p>8 Q You don't see the language?</p> <p>9 A Where is this?</p> <p>10 Q Okay. We're on Exhibit 3, at the very top,</p> <p>11 at the very first paragraph. First page.</p> <p>12 A The first page?</p> <p>13 Q Yes. Are you with me?</p> <p>14 A Okay.</p> <p>15 Q Okay? It says, "Pursuant to an exclusive</p> <p>16 recording agreement, the artist agreement, between me</p> <p>17 and T.T.E.D. Records." Do you see that?</p> <p>18 A Yeah.</p> <p>19 Q Okay.</p> <p>20 A I have a question.</p> <p>21 Q Of course.</p> <p>22 A Who is "me"?</p>
<p style="text-align: right;">Page 131</p> <p>1 signatures of the other members of the band that if</p> <p>2 you see their signature, you know it's them?</p> <p>3 A Yes.</p> <p>4 Q Can you just take a look at that same page</p> <p>5 31 that we just looked at.</p> <p>6 MR. TALCOTT: Back to Exhibit 4?</p> <p>7 MR. BART: Of Exhibit 3.</p> <p>8 MR. TALCOTT: Exhibit 3.</p> <p>9 MR. BART: Yes.</p> <p>10 BY MR. BART:</p> <p>11 Q Do you recognize the signatures of the</p> <p>12 other members of the band other than you?</p> <p>13 A Well, I recommend -- I recognize -- I</p> <p>14 recognize Robert's.</p> <p>15 Q Okay.</p> <p>16 A We did a lot of signing together.</p> <p>17 Q Okay. Fair enough.</p> <p>18 A Yeah.</p> <p>19 Q Thank you. Do you recognize Carl Kidd's</p> <p>20 signature?</p> <p>21 A Not really.</p> <p>22 Q Okay. Fair enough. Thank you. So this is</p>	<p style="text-align: right;">Page 133</p> <p>1 Q Okay. The people sending the letter. This</p> <p>2 is a letter from -- if you go to page 31, at the very</p> <p>3 back, where the signatures are. Go to that last page</p> <p>4 again. You see right above the signatures, it says</p> <p>5 "Very truly yours," signed by the members of the</p> <p>6 band?</p> <p>7 A Mm-hmm.</p> <p>8 Q Yes?</p> <p>9 A Yes, I see that. Yes.</p> <p>10 Q Okay. Fair enough. And so this is a</p> <p>11 letter addressed on the first page -- go to the first</p> <p>12 page, it's addressed to Island Records, 14 East 4th</p> <p>13 Street; do you see that?</p> <p>14 A Yes.</p> <p>15 Q Did you ever visit Island Records at 14</p> <p>16 East 4th Street?</p> <p>17 A Yes, I believe we visited there a couple of</p> <p>18 times.</p> <p>19 Q So this is a letter being sent to Island</p> <p>20 Records Inc. at 14 East 4th Street, "Gentlemen,"</p> <p>21 that's the way of starting the letter, and then it's</p> <p>22 signed "Very truly yours, James Avery, Tony Fisher,</p>

<p style="text-align: right;">Page 134</p> <p>1 Robert Reed, and Taylor Reed," right?</p> <p>2 A Yes. I hear you. Yes.</p> <p>3 Q Okay. But you don't understand the format</p> <p>4 of this or what the document says?</p> <p>5 A No, I don't even remember a document like</p> <p>6 this.</p> <p>7 Q Okay. Fair enough. Because you didn't</p> <p>8 read any of the documents, you were just advised</p> <p>9 about them by your counsel, correct?</p> <p>10 A Right.</p> <p>11 Q Okay. So if I put in front of you the</p> <p>12 original copies of what was signed as opposed to</p> <p>13 photocopies of what was signed that day, you wouldn't</p> <p>14 recognize what was said there because you didn't</p> <p>15 actually read those documents?</p> <p>16 A No, I would recognize what was said. But I</p> <p>17 don't remember -- I wouldn't recognize what was said</p> <p>18 on paper.</p> <p>19 Q You would remember what was said between</p> <p>20 people.</p> <p>21 A What was read, yes.</p> <p>22 Q But you're not going to remember the text</p>	<p style="text-align: right;">Page 136</p> <p>1 crossed off, you see "JA" on the top, and then "TR,"</p> <p>2 "TF," and "RR" underneath it?</p> <p>3 A It's -- this initial right here?</p> <p>4 Q No, no. On page -- no, no. On page 29.</p> <p>5 It may be too faint for you to see on this copy.</p> <p>6 A I only see "TR" on here.</p> <p>7 Q Oh, okay. I have a better copy. But</p> <p>8 whatever. You recall testifying that there was a</p> <p>9 change made because there was language talking about</p> <p>10 how Island wasn't going to pay you directly, so that</p> <p>11 was crossed off because you wanted to be paid</p> <p>12 directly by Island, correct?</p> <p>13 A That was just one of the changes, yes.</p> <p>14 Q Okay. And in fact, do you remember that at</p> <p>15 the time that all of these agreements were signed,</p> <p>16 there was a separate agreement providing that Island</p> <p>17 would pay you directly?</p> <p>18 A Yes.</p> <p>19 Q Okay. Let me just show you another copy,</p> <p>20 and we can try to find the best original one that we</p> <p>21 can, but if you'll take a look, for example, this is</p> <p>22 a better copy of page 29 of Exhibit 3. Do you have</p>
<p style="text-align: right;">Page 135</p> <p>1 of any of these agreements, correct?</p> <p>2 A Right.</p> <p>3 Q Right?</p> <p>4 A Right.</p> <p>5 Q Okay. Now, take a look -- and I'm not</p> <p>6 going to try and walk you through agreements that are</p> <p>7 very legal and not part of what you did from 30 years</p> <p>8 ago. I just want to point out one thing for you. If</p> <p>9 you take a look at pages 2 and 3 of Exhibit 3.</p> <p>10 A Mm-hmm.</p> <p>11 Q Is yours a two-sided copy? Yes, okay. So</p> <p>12 the paragraph at the bottom of what's marked page 28</p> <p>13 and the top of page 29, do you see that, paragraph 6?</p> <p>14 A Yeah.</p> <p>15 Q You see that's crossed off and initialed,</p> <p>16 right?</p> <p>17 A Yes.</p> <p>18 Q Okay. And it's initialed by the four of</p> <p>19 you, correct? James Avery, Taylor Reed, Tony Fisher,</p> <p>20 Robert Reed.</p> <p>21 A I don't see my initial on here.</p> <p>22 Q On page 29, underneath the paragraph that's</p>	<p style="text-align: right;">Page 137</p> <p>1 that in front of you? Do you see at the top and</p> <p>2 bottom of that top paragraph, there are four</p> <p>3 initials, the top one, "JA," and the bottom one,</p> <p>4 "TR," "TF," and "RR"?</p> <p>5 A Yes, I see that.</p> <p>6 Q Okay.</p> <p>7 A Mm-hmm.</p> <p>8 Q So those were James Avery, Taylor Reed,</p> <p>9 Tony Fisher, and Robert Reed, correct?</p> <p>10 A Correct.</p> <p>11 Q Okay. Thank you.</p> <p>12 MR. BART: And thank you. That's your</p> <p>13 other copy.</p> <p>14 BY MR. BART:</p> <p>15 Q And let me just show you what was marked</p> <p>16 yesterday as Exhibit 9. And on the second page,</p> <p>17 those are the signatures of the members of the band</p> <p>18 again, correct, including yourself?</p> <p>19 A Yes.</p> <p>20 Q And this is an agreement where, if you look</p> <p>21 at the big paragraph A in the middle of the first</p> <p>22 page, are you with me, where I'm pointing, on the</p>

<p style="text-align: right;">Page 138</p> <p>1 first page of that document I just gave you?</p> <p>2 MR. TALCOTT: Turn it over. Right there.</p> <p>3 A Okay.</p> <p>4 BY MR. BART:</p> <p>5 Q Okay. Where it goes, "The royalties and</p> <p>6 sums payable pursuant to 7-A through 7-D of the</p> <p>7 Island contract shall be divided and paid 58.33</p> <p>8 percent of 100 percent thereof to artist and 41.67</p> <p>9 percent of 100 percent to T.T.E.D."</p> <p>10 Do you see that language?</p> <p>11 A Yes.</p> <p>12 Q Okay. And do you recall that Island agreed</p> <p>13 that they would pay your share directly to you and</p> <p>14 Maxx Kidd's share directly to him?</p> <p>15 A Yes.</p> <p>16 Q Okay. Do you remember the percentages that</p> <p>17 were paid of the overall amount, how much each one of</p> <p>18 you got?</p> <p>19 A No.</p> <p>20 Q Okay. Fair enough. Now, after -- you can</p> <p>21 put that down, I'm not going to ask you any more</p> <p>22 legal agreement questions, at least right now. So</p>	<p style="text-align: right;">Page 140</p> <p>1 Q You remember that Island Records released a</p> <p>2 bunch of Trouble Funk records, correct?</p> <p>3 A Right.</p> <p>4 Q Some stuff that went back to '82 or '83 and</p> <p>5 some newer stuff that came out later that hadn't been</p> <p>6 on any other album, right?</p> <p>7 A Right.</p> <p>8 Q Okay. So there's old stuff, there's new</p> <p>9 stuff, it's all coming out on Island after these</p> <p>10 deals, right?</p> <p>11 A Okay. Right.</p> <p>12 Q Did Maxx Kidd have anything to do with</p> <p>13 Trouble Funk after Trouble Funk recordings started</p> <p>14 coming out on Island Records? Was he involved with</p> <p>15 the band at all?</p> <p>16 A Yes. Island Records gave us tour support.</p> <p>17 Q Okay.</p> <p>18 A And I guess Maxx was appointed to go over</p> <p>19 there and, you know, promote along with the group,</p> <p>20 the records.</p> <p>21 Q Okay. So he was involved, when you did</p> <p>22 tours, Maxx Kidd was part of the tour support that</p>
<p style="text-align: right;">Page 139</p> <p>1 after your meeting with Blackwell and Kidd and the</p> <p>2 other members of the band in Georgetown, and</p> <p>3 Mr. Blackwell said to you, you know, if you're going</p> <p>4 to do a deal with me, you have to have Maxx Kidd in</p> <p>5 it, and you either like him or love him or hate him?</p> <p>6 You remember the conversation --</p> <p>7 A Yes. I remember that conversation.</p> <p>8 Q You remember it better than I do. I'm just</p> <p>9 paraphrasing it. After that conversation and after</p> <p>10 all these agreements were signed, and after you</p> <p>11 started working together with Island, what if any</p> <p>12 involvement did Maxx Kidd have with Trouble Funk?</p> <p>13 Was he working at all on any of the records that</p> <p>14 Island was releasing of Trouble Funk?</p> <p>15 A Okay. Can you repeat that?</p> <p>16 Q Sure. After the meeting with Blackwell and</p> <p>17 Kidd.</p> <p>18 A Mm-hmm.</p> <p>19 Q After these agreements are signed that</p> <p>20 we've just gone through, you're now working in a deal</p> <p>21 with Island Records.</p> <p>22 A Okay.</p>	<p style="text-align: right;">Page 141</p> <p>1 Island provided to you pursuant to your agreements</p> <p>2 with them, right?</p> <p>3 A Right.</p> <p>4 Q Okay. And where did you tour that Island</p> <p>5 provided tour support for you?</p> <p>6 A London, Amsterdam, Germany, Switzerland,</p> <p>7 Paris.</p> <p>8 Q Nice tour.</p> <p>9 A Yeah. A few other places I don't remember.</p> <p>10 But yeah, it was pretty much in the UK.</p> <p>11 Q Okay. And was that one tour or are those</p> <p>12 different tours?</p> <p>13 A I think just one tour.</p> <p>14 Q And do you know when that took place?</p> <p>15 A I think around '85. Well, between '85 and</p> <p>16 '87.</p> <p>17 Q Okay. Fair enough.</p> <p>18 A Yes.</p> <p>19 Q And in fact, wasn't at least one of those</p> <p>20 shows, I think the London show, recorded and</p> <p>21 released? Wasn't there --</p> <p>22 A London Town and Country. One was recorded</p>

<p style="text-align: right;">Page 154</p> <p>1 mean as an actor. I mean what roles, what services</p> <p>2 did he render to help make the film, if any?</p> <p>3 A Again, he controlled all of the other</p> <p>4 artists outside of Trouble Funk.</p> <p>5 Q Okay.</p> <p>6 A So he had Redds and the Boys do -- and</p> <p>7 because he couldn't control Trouble Funk, he had</p> <p>8 Redds and the Boys do the title soundtrack.</p> <p>9 Q Didn't you guys do a version of Good to Go?</p> <p>10 A Yeah, we did -- no, yeah, we did Good to</p> <p>11 Go. But Movin' and Groovin' was like one of the</p> <p>12 deejay songs of the soundtrack that they put a lot</p> <p>13 into, because Maxx controlled Redds and the Boys.</p> <p>14 Q Oh, okay. Nobody said that to you</p> <p>15 directly, did they, that the reason they did it is</p> <p>16 because Maxx controlled Redds and the Boys, that's</p> <p>17 just your conclusion based upon knowing Maxx and</p> <p>18 knowing his relationship with Blackwell?</p> <p>19 A Okay. You can put it that way, yes.</p> <p>20 Q Okay. So you had this meeting at</p> <p>21 Gallagher's with --</p> <p>22 A By the way, he did say that.</p>	<p style="text-align: right;">Page 156</p> <p>1 about the film project, you know, at that lunch or at</p> <p>2 that meeting? I assume it was a lunch, but maybe it</p> <p>3 was a dinner.</p> <p>4 A He was pretty much, you know, just telling</p> <p>5 us about what he wanted to do. And a lot of things</p> <p>6 changed from that meeting, because I was supposed to</p> <p>7 have been one of the key actors in there, Tony. They</p> <p>8 wound up using the name but they got --</p> <p>9 Q An actor?</p> <p>10 A Yeah, which was something that I found that</p> <p>11 was influenced by Maxx Kidd.</p> <p>12 Q Okay.</p> <p>13 A And he also mentioned how big he was going</p> <p>14 to make the group, you know, and...</p> <p>15 Q How big Chris was going to make Trouble</p> <p>16 Funk?</p> <p>17 A That's what Chris Blackwell, yeah, said,</p> <p>18 wanted to make the group real big. And I remember</p> <p>19 saying, "I'll believe it when I see it," and their</p> <p>20 jaws dropped, I mean, you know. But hey --</p> <p>21 Q Life is short. So is this before your trip</p> <p>22 to Europe?</p>
<p style="text-align: right;">Page 155</p> <p>1 Q Who did?</p> <p>2 A Maxx.</p> <p>3 Q Oh, Maxx said to you --</p> <p>4 A "I'm going to push Redds and the Boys on</p> <p>5 this movie."</p> <p>6 Q Fair enough. So you're at the meeting at</p> <p>7 Gallagher's with Maxx and with Chris Blackwell. Was</p> <p>8 anyone else present?</p> <p>9 A Outside of the group?</p> <p>10 Q Yes.</p> <p>11 A Not that I can remember.</p> <p>12 Q Okay.</p> <p>13 A No.</p> <p>14 Q And how many members of the group were</p> <p>15 there?</p> <p>16 A It was --</p> <p>17 Q The four of you?</p> <p>18 A The four of us, yes.</p> <p>19 Q So by that time, really the four of you</p> <p>20 were the core members of the band?</p> <p>21 A Yes.</p> <p>22 Q And what do you recall being discussed</p>	<p style="text-align: right;">Page 157</p> <p>1 A Yes.</p> <p>2 Q Okay. So clearly Island had big plans for</p> <p>3 you in the sense of doing a film, sending you over to</p> <p>4 Europe, ultimately sending you to Japan, correct?</p> <p>5 A Right.</p> <p>6 Q Okay.</p> <p>7 A Mm-hmm.</p> <p>8 Q And the album that was -- there was an</p> <p>9 album that was released by Island called Saturday</p> <p>10 Night Live from Washington, DC. Are you familiar</p> <p>11 with that?</p> <p>12 A Yes. Paragon.</p> <p>13 Q And that's the same one that was the second</p> <p>14 disk of --</p> <p>15 A Right.</p> <p>16 Q Okay. So I just had the title wrong.</p> <p>17 Island did release that as a separate record called</p> <p>18 Saturday Night Live from Washington, DC?</p> <p>19 A Right. Okay.</p> <p>20 Q Thanks. Just one second. Yes. Now, do</p> <p>21 you remember an album that Island released that had a</p> <p>22 number of go-go artists including yourself called Go</p>

<p style="text-align: right;">Page 158</p> <p>1 Go Crankin'?</p> <p>2 A I think I remember something like that.</p> <p>3 Yeah, it was a compilation.</p> <p>4 Q And do you remember -- let me just make</p> <p>5 sure I have that in front of me. I don't. Oh, wait</p> <p>6 a second. Just take a look at this.</p> <p>7 A Yes, "Paint the White House Black." I</p> <p>8 remember this.</p> <p>9 Q And that was the compilation record you</p> <p>10 were just talking about?</p> <p>11 A Yes.</p> <p>12 Q And who were the other bands that were on</p> <p>13 it?</p> <p>14 A Chuck Brown. Experience Unlimited.</p> <p>15 Iceberg Slim. Hot Cold Sweat.</p> <p>16 Q How many -- were all of the other bands</p> <p>17 other than Trouble Funk controlled by Maxx Kidd?</p> <p>18 A Yes.</p> <p>19 Q Okay.</p> <p>20 A Yes.</p> <p>21 Q Do you know who this is?</p> <p>22 A That's Maxx Kidd.</p>	<p style="text-align: right;">Page 160</p> <p>1 Good to Go or Short Fuse or whatever the title</p> <p>2 ultimately was. Good to Go was a single that was</p> <p>3 released by the band on Island as well, wasn't it?</p> <p>4 A Correct.</p> <p>5 Q Okay. And where was that recorded? Was</p> <p>6 that recorded up in New York at --</p> <p>7 A Yes.</p> <p>8 Q In that session you were telling us about</p> <p>9 before?</p> <p>10 A Yes.</p> <p>11 Q And they also released as a single It's in</p> <p>12 the Mix, Don't Touch That Stereo. Do you recall when</p> <p>13 Island released that as a single as well?</p> <p>14 A As a rerelease, yes.</p> <p>15 Q Yes, that's a rerelease of one of the</p> <p>16 earlier D.E.T.T. releases, correct?</p> <p>17 A Right.</p> <p>18 Q Then there was a Live in London album that</p> <p>19 was released; do you remember that?</p> <p>20 A Yes.</p> <p>21 Q Okay. And do you recall where it was</p> <p>22 recorded, where in London you recorded that?</p>
<p style="text-align: right;">Page 159</p> <p>1 Q Okay. Fair enough. Did you ever hear of</p> <p>2 an Island label called 4th and Broadway?</p> <p>3 A Yes.</p> <p>4 Q And isn't that where their offices were</p> <p>5 located?</p> <p>6 A Yes.</p> <p>7 Q And some of the product that was released</p> <p>8 was released on 4th and Broadway, correct?</p> <p>9 A Yes.</p> <p>10 Q Okay. Thanks. And just bear with me one</p> <p>11 second. And on this Go Go Crankin' record, Say What</p> <p>12 was one of the tracks, right?</p> <p>13 A Yes. I guess it was. Yes.</p> <p>14 Q Okay. And the -- you didn't rerecord it</p> <p>15 for this purpose, they just took the D.E.T.T. single</p> <p>16 that had been released and put it out on this, right?</p> <p>17 A Yes. Yes.</p> <p>18 Q Okay. And actually, the same is true for</p> <p>19 Let's Get Small, it was the same version?</p> <p>20 A Exactly, yes.</p> <p>21 Q Fair enough. Thank you. And Island also</p> <p>22 released the song -- we were talking before about</p>	<p style="text-align: right;">Page 161</p> <p>1 A I think that was Town and Country.</p> <p>2 Q Is that the name of the venue?</p> <p>3 A The club, yes.</p> <p>4 Q Okay. And that was just the band</p> <p>5 performing, correct?</p> <p>6 A Yes.</p> <p>7 Q There were no other musicians playing that</p> <p>8 night?</p> <p>9 A No.</p> <p>10 Q It was all recorded in the same live</p> <p>11 performance?</p> <p>12 A Yes.</p> <p>13 Q Okay. Then there was a new single that was</p> <p>14 released called Women of Principle?</p> <p>15 A Woman of Principle.</p> <p>16 Q "Woman," singular?</p> <p>17 A Woman of Principle.</p> <p>18 Q Women of Principle? Singular? "Woman" or</p> <p>19 "women"?</p> <p>20 A "Woman."</p> <p>21 Q "Woman." Okay. Fair enough. Thank you.</p> <p>22 But that was a new single that hadn't been released</p>

<p style="text-align: right;">Page 162</p> <p>1 before, correct?</p> <p>2 A Yes.</p> <p>3 Q Okay. Why are you sighing?</p> <p>4 A It was a bad single.</p> <p>5 Q Oh, okay. Fair enough. And where was that</p> <p>6 recorded?</p> <p>7 A I'm not sure, because some of the</p> <p>8 recordings we did over in the islands, Chris</p> <p>9 Blackwell's --</p> <p>10 Q In Jamaica?</p> <p>11 A In Jamaica, yes.</p> <p>12 Q Okay. So --</p> <p>13 A I think that was one of them.</p> <p>14 Q So Island flew you over to Jamaica to</p> <p>15 record in Blackwell's studios over there?</p> <p>16 A Yes.</p> <p>17 Q And did he have his whole complex there at</p> <p>18 the time?</p> <p>19 A Yes. We stayed in his flats, whatever you</p> <p>20 call it, on the beach.</p> <p>21 Q That's a resort, basically a resort</p> <p>22 community, right?</p>	<p style="text-align: right;">Page 164</p> <p>1 Q Okay. You appeared on all the tracks,</p> <p>2 though, didn't you, or not?</p> <p>3 A No.</p> <p>4 Q No? Which ones didn't you -- which ones</p> <p>5 did you appear on?</p> <p>6 A The ones that I wrote.</p> <p>7 Q Okay. Did you leave the band at any point?</p> <p>8 A No. We actually -- at one point we -- we</p> <p>9 had two Trouble Funks.</p> <p>10 Q Really?</p> <p>11 A Yeah.</p> <p>12 Q And when was that?</p> <p>13 A It was shortly after the album was</p> <p>14 finished.</p> <p>15 Q Okay.</p> <p>16 A Yeah.</p> <p>17 Q Because you were unhappy with the direction</p> <p>18 it was going and --</p> <p>19 A I wasn't happy with the direction. That</p> <p>20 wasn't -- that was not the Trouble Funk sound.</p> <p>21 Q So you basically created your own Trouble</p> <p>22 Funk, and there were competing Trouble Funks out</p>
<p style="text-align: right;">Page 163</p> <p>1 A Right. Mm-hmm.</p> <p>2 Q So they flew you over and you stayed in</p> <p>3 those residences and recorded at the studio, correct?</p> <p>4 A Yes.</p> <p>5 Q How often did you go to Jamaica to record?</p> <p>6 A I only went once.</p> <p>7 Q Okay. And how many recordings did you do</p> <p>8 during that session?</p> <p>9 A Well, we actually flew over there different</p> <p>10 times. It's like they -- Robert and James and Taylor</p> <p>11 went there before me, because they was doing more</p> <p>12 stuff. I didn't like the way the album was going, so</p> <p>13 I pretty much, you know...</p> <p>14 Q Which album were you talking about?</p> <p>15 A Trouble Over Here.</p> <p>16 Q Oh, okay. That was -- was that a full</p> <p>17 album or -- yeah, okay, Trouble Over Here, Trouble</p> <p>18 Over There?</p> <p>19 A Yes.</p> <p>20 Q So you weren't crazy about where it was</p> <p>21 going, so you didn't get as involved as they did?</p> <p>22 A No, I didn't.</p>	<p style="text-align: right;">Page 165</p> <p>1 there?</p> <p>2 A It wasn't really competing. They wanted --</p> <p>3 (Simultaneous speaking.)</p> <p>4 Q Well, you had two of them, whether they</p> <p>5 were competing or not.</p> <p>6 A One was the Trouble Funk that had Big Tony.</p> <p>7 Q Okay. You know, I'm not -- I'm not</p> <p>8 expressing any opinions in this deposition,</p> <p>9 Mr. Fisher. I'm just --</p> <p>10 A Yes, sir.</p> <p>11 Q So there was a point at which right after</p> <p>12 the release of this that Tony Fisher had a Trouble</p> <p>13 Funk and the other members had a Trouble Funk?</p> <p>14 A Yes.</p> <p>15 Q And they were both out in the marketplace</p> <p>16 for a while?</p> <p>17 A Yes.</p> <p>18 Q And when did the members reconcile and come</p> <p>19 back and have just one Trouble Funk?</p> <p>20 A When they realized that...</p> <p>21 Q Time-wise.</p> <p>22 A Okay. I don't remember. I don't remember.</p>

<p style="text-align: right;">Page 166</p> <p>1 We did reconcile, though.</p> <p>2 Q How long a period were you running your own</p> <p>3 Trouble Funk?</p> <p>4 A For about a year.</p> <p>5 Q And it was basically right after the</p> <p>6 release of this record?</p> <p>7 A Pretty much, yes. After the release of</p> <p>8 this record and the release of Trouble Funk on Island</p> <p>9 Records.</p> <p>10 Q The Trouble Over Here, Trouble Over There</p> <p>11 by Island Records?</p> <p>12 A I mean, when we pretty much was released</p> <p>13 from the -- from the label.</p> <p>14 Q Oh, okay. Okay. Well, the album Trouble</p> <p>15 Over Here, Trouble Over There was sort of like the</p> <p>16 last big project that you did with Island, correct?</p> <p>17 A Right.</p> <p>18 Q And so they marketed that for whatever</p> <p>19 period of time they marketed it.</p> <p>20 A Yes.</p> <p>21 Q And then ultimately, you had a termination</p> <p>22 agreement with them, right?</p>	<p style="text-align: right;">Page 168</p> <p>1 Q Did you have counsel at that point? Did</p> <p>2 you have a lawyer who was helping you negotiate or</p> <p>3 deal with this agreement?</p> <p>4 A You mean...</p> <p>5 Q What's been marked as Exhibit 17.</p> <p>6 A I'm not sure -- I'm not sure what this --</p> <p>7 what is this agreement supposed to be?</p> <p>8 Q Well, I can read it to you, but, you know,</p> <p>9 if you don't have -- it basically says -- it's a</p> <p>10 letter to the four of you.</p> <p>11 A Uh-huh.</p> <p>12 Q Saying, from Island Records, dated November</p> <p>13 30th, 1989. So this is about two years after the</p> <p>14 release of the Trouble Over Here, Trouble Over There</p> <p>15 record.</p> <p>16 A Right.</p> <p>17 Q And it goes, "Reference is made to the</p> <p>18 agreements dated October 11th, 1984, between you and</p> <p>19 us," which we've looked at before, the agreements</p> <p>20 that I showed you that had that date; do you</p> <p>21 remember?</p> <p>22 A Right. Yes.</p>
<p style="text-align: right;">Page 167</p> <p>1 A Yes.</p> <p>2 Q You basically parted ways?</p> <p>3 A Right.</p> <p>4 Q Actually, let me show you that. Take a</p> <p>5 look at the third page. I'll wait for you. See it?</p> <p>6 Is that your signature?</p> <p>7 A Yes.</p> <p>8 Q Okay. And you recognize Mr. Reed's</p> <p>9 signature?</p> <p>10 A Yes.</p> <p>11 Q But not the other two, because you're not</p> <p>12 as familiar with their signatures?</p> <p>13 A No, I'm not.</p> <p>14 Q Okay. And do you recall that there was an</p> <p>15 agreement when you parted ways with Island Records in</p> <p>16 1989?</p> <p>17 A Do I recall...</p> <p>18 Q That there was a written agreement at the</p> <p>19 time you parted ways with Island Records.</p> <p>20 A Yes.</p> <p>21 Q Okay.</p> <p>22 A Yes.</p>	<p style="text-align: right;">Page 169</p> <p>1 Q Okay. "This letter when signed by you and</p> <p>2 us shall constitute our mutual agreement to terminate</p> <p>3 the term of the agreements upon the terms and</p> <p>4 conditions set forth."</p> <p>5 So this is a termination agreement that</p> <p>6 terminates those other agreements, and basically</p> <p>7 provides that Island keeps its rights, they will</p> <p>8 continue to pay whatever they're going to pay, and</p> <p>9 various other things. The agreement -- I don't want</p> <p>10 to just give you a whole summary of it.</p> <p>11 A Right. Okay. Yes.</p> <p>12 Q But it's a termination agreement.</p> <p>13 A Yes. This is my signature. But I don't</p> <p>14 remember the agreement.</p> <p>15 Q Okay. Underneath the four names on the</p> <p>16 first page, right there where it's addressed to the</p> <p>17 four of you.</p> <p>18 A Yes.</p> <p>19 Q There's a name, "care of Joseph Lloyd</p> <p>20 Serling, Esq." Do you see that?</p> <p>21 A Yes.</p> <p>22 Q Do you know who Mr. Serling is?</p>

<p style="text-align: right;">Page 170</p> <p>1 A No.</p> <p>2 Q The "Esq." generally references an</p> <p>3 attorney. So I think it's a safe assumption that</p> <p>4 they're sending this to you in care of some attorney.</p> <p>5 But you don't have any recollection of Mr. Serling or</p> <p>6 having him represent you in any way?</p> <p>7 A No, I don't remember.</p> <p>8 Q Okay. Now, right before we got into the</p> <p>9 discussion of the termination, I had asked you about</p> <p>10 Woman of Principle, which was a single you didn't</p> <p>11 like, and it came out roughly in 1987; do you recall</p> <p>12 that?</p> <p>13 A Yes.</p> <p>14 Q And then they're working on the Trouble</p> <p>15 Over Here, Trouble Over There album, right? That's</p> <p>16 the one that was being recorded down in --</p> <p>17 A Yes. Woman of Principle came off that as a</p> <p>18 single.</p> <p>19 Q Fair enough. And ultimately, the song</p> <p>20 Trouble itself came off as a single, didn't it?</p> <p>21 A Yes. Yes.</p> <p>22 Q So there were at least two singles from</p>	<p style="text-align: right;">Page 172</p> <p>1 Trouble Funk, is that --</p> <p>2 A Right.</p> <p>3 Q Oh, okay.</p> <p>4 A Correct.</p> <p>5 Q So during the time that you were touring to</p> <p>6 support this record, where were you touring?</p> <p>7 A The UK.</p> <p>8 Q Okay. The UK record that we talked about</p> <p>9 before, that live record from London.</p> <p>10 A Yes.</p> <p>11 Q That came out in 1986, as I understand it.</p> <p>12 But is it your recollection -- because it's your</p> <p>13 recollection that matters. Is it your recollection</p> <p>14 that that came out after the Trouble Over Here,</p> <p>15 Trouble Over There album was released?</p> <p>16 A I'm not certain. I do know that we went</p> <p>17 over there more than once.</p> <p>18 Q Oh, you went over to London more than once?</p> <p>19 A Yes.</p> <p>20 Q Oh, okay. Okay. And did you have more</p> <p>21 than one European tour, or you just went back to</p> <p>22 London one more time?</p>
<p style="text-align: right;">Page 171</p> <p>1 that album; there was Woman of Principle, and there</p> <p>2 was Trouble, right?</p> <p>3 A Yes.</p> <p>4 Q Was there an EP of that that was released</p> <p>5 from that album as well?</p> <p>6 A Not that I know of.</p> <p>7 Q Do you know whether the other Trouble Funk,</p> <p>8 the non-Tony-Fisher Trouble Funk did any touring to</p> <p>9 support this record?</p> <p>10 A No.</p> <p>11 Q You don't know?</p> <p>12 A No, I know they did not.</p> <p>13 Q You know they did not?</p> <p>14 A Yes.</p> <p>15 Q Okay. So they didn't -- to your knowledge,</p> <p>16 did they do any touring in the time when you were</p> <p>17 running your own Trouble Funk?</p> <p>18 A No. We actually toured for a while. I</p> <p>19 mean, we toured for a while.</p> <p>20 Q Oh, you toured in support of this record?</p> <p>21 A In support of this record, yes.</p> <p>22 Q Oh, okay. Before you created your own</p>	<p style="text-align: right;">Page 173</p> <p>1 A We had more than one European tour.</p> <p>2 Q Okay. And both of them during the term of</p> <p>3 the Island contract, right?</p> <p>4 A Yes.</p> <p>5 Q Okay. And both, they provided tour support</p> <p>6 for you, for the European tours, correct?</p> <p>7 A Yes, I believe so.</p> <p>8 Q Okay.</p> <p>9 A Yes.</p> <p>10 Q And where did you perform on the second</p> <p>11 tour?</p> <p>12 A Some of those places, we went back to...</p> <p>13 Q The same places?</p> <p>14 A Yes. The same areas, different venues.</p> <p>15 Q Right. Did you go to any new venues, any</p> <p>16 new areas?</p> <p>17 A Yes. I don't remember -- I do know the</p> <p>18 second time, I think the second time around we did</p> <p>19 the Montreux Jazz Festival.</p> <p>20 Q Oh, okay.</p> <p>21 A And then we did Netherland the second time.</p> <p>22 Q Netherlands?</p>